

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:22-cv-203-JRG
)	
MICRON TECHNOLOGY, INC.; MICRON)	JURY TRIAL DEMANDED
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	
)	

**DECLARATION OF RYUK PARK IN SUPPORT OF
DEFENDANTS' REPLY IN SUPPORT OF ITS MOTION TO SHOW CAUSE**

I am an attorney at the law firm of Winston & Strawn LLP, counsel of record for Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC (collectively, “Micron”) in the above captioned matter. I am a member in good standing of the State Bar of Texas. I provide this declaration in support of Micron’s Reply to Netlist’s Opposition to Micron’s Motion to Show Cause.

1. A true and correct copy of a LinkedIn profile for Mr. Chi-She (“Jesse”) Chen is attached as **Exhibit E**. I relied on the public LinkedIn profile of Mr. Chen, which lists Netlist, Inc. as his current employer, in serving (or causing to be served) a 30(b)(1) deposition notice for Mr. Chen.

2. A true and correct copy of a LinkedIn profile for Mr. Jeffrey Solomon is attached as **Exhibit F**. I relied on the public LinkedIn profile of Mr. Solomon, which lists Netlist, Inc. as his current employer, in serving (or causing to be served) a 30(b)(1) deposition notice for Mr. Solomon.

3. On July 21, 2023, I met and confer with Ms. Yanan Zhao regarding the parties’ deposition notices. During the call, Ms. Zhao indicated that some of the witnesses Micron noticed for 30(b)(1) depositions were former employees. Ms. Zhao, however, did not identify who those witnesses were.

4. During the same call, Ms. Zhao indicated that Netlist was considering whether to accept service of the deposition notices, in lieu of third-party subpoenas. Ms. Zhao did not indicate, however, that Netlist was not authorized to accept service on behalf of the former employees.

5. A true and correct copy of the September 4, 2023 correspondence requesting a lead/local meet and confer is attached as **Exhibit G**.

Executed on October 10, 2023, in Cupertino, California.

By: /s/ Ryuk Park
Ryuk Park